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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Jessica S. Allen  
v. :  
RYAN A. MANUELLA : Mag. No. 21-8035  
a/k/a Ryan Manuela : CRIMINAL COMPLAINT

I, Jason Kidd, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

/s/ Jason Kidd

Special Agent Jason Kidd  
Federal Bureau of Investigation

Sworn to before me by telephone pursuant  
to F.R.C.P. 4.1(B)(2)(A), on April 19, 2021

THE HONORABLE JESSICA S. ALLEN  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**  
(Abusive Sexual Contact)

On or about April 16, 2021, in the District of New Jersey and elsewhere, defendant

**RYAN A. MANUELLA,  
a/k/a Ryan Manuela**

in the special aircraft jurisdiction of the United States, knowingly engaged in sexual contact, as defined in 18 U.S.C. § 2246(3), with another person (the Victim) by intentionally touching the Victim's groin and inner thigh both directly and through Victim's clothing, without the Victim's permission.

In violation of Title 18, United States Code, Section 2244(b) and Title 49, United States Code, Section 46506.

**ATTACHMENT B**

I, Jason Kidd, a Special Agent with the Federal Bureau of Investigation, having conducted an investigation and having spoken with other individuals, have knowledge of the following facts. Because this Complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause. All included statements are related in substance and in part. All dates and times are approximations.

1. On or about April 16, 2021, defendant Ryan Manuella (MANUELLA) was a male passenger aboard United Airlines flight 1729 (the Flight), departing from Denver, Colorado at approximately 10:20 a.m. Mountain Daylight Time, and arriving at Newark Liberty International Airport in Newark, New Jersey at approximately 3:37 p.m Eastern Daylight Time.

2. A male passenger (Passenger A) was assigned to the aisle seat in the same row as a female passenger (the Victim) who was seated in the window seat. The middle seat between them was vacant. MANUELLA was unknown to both the Victim and Passenger A, who also did not know one another.

3. During the Flight, MANUELLA moved about the cabin, sitting in various seats. At one point, Passenger A left his seat to use the lavatory. MANUELLA then sat in Passenger A's seat, opened a bag belonging to Passenger A, rummaged inside, and took a pair of glasses without the permission of Passenger A. When Passenger A returned to his seat, Passenger A told MANUELLA to vacate Passenger A's seat. MANUELLA then sat in the middle seat beside the Victim.

4. While seated next to the Victim, MANUELLA touched the Victim on the groin and inner thigh with his hand, both directly and through the Victim's clothing, all without the Victim's permission.

5. The Victim told MANUELLA in a loud voice to get away from her, stood up quickly from her seat, and sought the assistance of a flight attendant. Passenger A also heard the Victim tell MANUELLA to get away from her and saw her leave her seat quickly. A flight attendant (Flight Attendant 1) observed that the Victim was visibly distraught, crying, and shaking. When the Victim told Flight Attendant 1 that MANUELLA had touched her, Flight Attendant 1 moved the Victim to a new seat for the remainder of the flight.

6. After the flight landed, law enforcement spoke with MANUELLA, who waived his *Miranda* rights and agreed to be interviewed. During this interview, which was video recorded, MANUELLA admitted that he sat in the same row as the Victim and that he touched Passenger A's bag and its contents. MANUELLA also

admitted that he touched the Victim's person with the intent to arouse and gratify himself. Specifically, MANUELLA admitted that he touched the Victim's hands, while the Victim's hands were on her groin, with a desire for his sexual gratification.